## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

\_\_\_\_\_

ETHICON WAVE 11 CASES LISTED IN EXHIBIT A TO PLAINTIFFS' NOTICE OF ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE REGARDING TIMOTHY <u>ULATOWSKI FOR WAVE 11</u>

In Wave 11, Plaintiffs have adopted their Wave 1 briefing filed against Timothy Ulatowski. [Dkt. 8529] (adopting Dkt. 2060 (motion) and Dkt. 2065 (memorandum) and Dkt. 2232 (reply)).

Defendants hereby adopt and incorporate by reference their Supplemental Response and Notice of Adoption filed in relation to Ulatowksi in Ethicon Wave 3, Dkt. 2910, and their Wave 1 Response Brief, Dkt. 2134.

For the reasons stated in Defendants' Wave 3 and Wave 1 briefing [Dkt. 2910, 2134], Plaintiffs' motion should be denied in its entirety.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar No. 8691) Butler Snow LLP 1020 Highland Colony Parkway Suite 1400 (39157) P.O. Box 6010 Ridgeland, MS 39158-6010 (601) 985-4561 william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar No. 5169) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824 Charleston, WV 24338 (304) 414-1800 srobinson@tcspllc.com

COUNSEL FOR DEFENDANTS

## **CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

s/ William M. Gage	s/ Willia	ım M. Ga	<i>age</i>
--------------------	-----------	----------	------------

49101717.v1